

Chavez, Richard - Washington, DC

From: ravener@connellco.com
Sent: Friday, March 17, 2006 10:38 AM
To: Chavez, Richard - Washington, DC
Cc: ravener@connellco.com
Subject: Procurement of Commodities for Foreign Donation; 7CFR Part 1496, RIN 0560-AH39
Importance: High

Re: Procurement of Commodities for Foreign Donation
7CFR Part 1496, RIN 0560-AH39

Gentlemen:

This is to advise that we, The Connell Company, have received a brief of the testimony provided at the February 21, 2006 meeting and we feel that we have not gained any further insight to the CCC's planned action. Therefore we must again repeat our concerns as listed in our e-mail of January 9, 2006 below:

----- Original Message -----

From: Joseph Ravener
To: Richard Chavez
Cc: Joseph Ravener
Sent: Monday, January 09, 2006 4:46 PM
Subject: Procurement of Commodities for Foreign Donation; 7 CFR Part 1496, RIN 0560-AH39

Re: Procurement of Commodities for Foreign Donation
7 CFR Part 1496, RIN 0560-AH39

Gentlemen:

The Connell Company is a supplier of Rice; Milled, Brown and/or Paddy. We participate extensively in supplying those commodities to the Commodity Credit Corporation ("CCC") in support of the U.S. Government's humanitarian food aid programs. On behalf of The Connell Company, I am writing to request a 45-day extension of the January 17, 2006 date established by CCC's notice (70 *Fed. Reg.* 74717) of a proposed rule to adopt new procedures to be used by CCC in evaluation of bids in connection with the procurement of commodities for donation overseas. That notice was published in the *Federal Register* of December 16, 2005, immediately prior to the holidays. I have only just become aware of the notice.

As the *Federal Register* notice identifies, the existing procurement procedures have been in effect "for many years." And while the notice states that the proposed rule has been determined to be "not significant," the background discussion identifies important potential impacts anticipated to result from the adoption of the proposed new procedures, including changes in port allocations and carrier selection. The notice also includes an unexplained reference to the "use of different types of ocean services."

The Connell Company believes that the revised procedures contemplated by the proposed rule have wide-ranging implications that require careful evaluation and informed comment, not a hasty response such as that which would be required by the date currently established in the *Federal Register* notice.

We accordingly request that that date be extended for 45 days

Respectfully,

THE CONNELL COMPANY,

J.F. Ravener
Senior Vice President

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